

EXHIBIT 6

EXHIBIT A

330 West 42nd Street • New York, NY 10036-6979

October 15, 2013

Margaret Nelson
Assistant Attorney General
Michigan Department of Attorney General
P.O. Box 30212
Lansing, Michigan 48909

Re: In re City of Detroit

Dear Ms. Nelson:

Pursuant to Local Rule 7.1 of the U.S. District Court for the Eastern District of Michigan and Local Bankruptcy Rule 9014-1(g), I write to advise that International Union, United Automobile Workers ("UAW") and the *Flowers* plaintiffs intend to file a motion to compel discovery of certain documents identified on the privilege logs accompanying the State's document production and to seek to narrow the potential issues or documents that would be involved in such a motion. Because of the exigent schedule, UAW requests that the City respond to this correspondence by October 18, 2013.

In opposition to the motion of Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees' Motion To Compel Testimony of Kevyn Orr and All Other City and State Witnesses Regarding City-State Communications Prior To July 17, 2013 (the "AFSCME Motion"), the City recites that it and the State entered into a common interest agreement "at the time of the appointment of the Emergency Manager."

The September 12, 2013 Common Interest Agreement recites that "on or around the appointment of the Emergency Manager" the City and State entered into a verbal common interest agreement. Mr. Orr was appointed to the position of "emergency financial manager" for the City on March 15, 2013.

Accordingly, and at a minimum, documents which antedate March 15, 2013, and which involve communications with the City (and counsel) cannot be covered by the attorney client privilege that the State has asserted here. Exhibit A to this letter sets out an entry on the first and third privilege logs dated March 12. It identifies a communication between Richard Baird and Kevyn Orr that "forward[s] attorney's legal advice." Inasmuch as there was no attorney-client relationship between Jones Day and the state, there is no basis for this document to be withheld and we request its production.

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Exhibit B to this letter are entries on the State's first and third privilege log where the State is withholding documents on the ground of "Executive Privilege." The State has waived deliberative privilege; thus it would appear that no documents should be withheld on grounds of Executive Privilege. Please produce these documents.¹ I also note that certain of these entries indicate that information is being redacted from a document which is included in the production. Because the log does not identify documents by bates number it is difficult to identify the referenced item. Please provide an identification of the redacted items by bates number.

Exhibit C to this letter is the State's second privilege log. It does not identify parties involved in any of the referenced communications nor does it indicate the subject matter of the communication or that it involved a request for legal advice. This is insufficient. To assert the privilege a party "must make a minimal showing that the communication involved legal matters. This showing is not onerous and may be satisfied by as little as a statement in the privilege log explaining the nature of the legal issue for which advice was sought. . . . Conclusory statements . . . do not satisfy even this minimal requirement." *In re Search Warrant Executed at Law Offices of Stephen Garea*, 173 F.3d 429, 429 (6th Cir. 1999); *see generally United States v. Construction Prods. Research, Inc.*, 73 F.3d 464, 473 (2d Cir. 1996) ("if the party invoking the privilege does not provide sufficient detail to demonstrate fulfillment of the legal requirements for application of the privilege, his claim will be rejected").

In addition certain documents are listed on this log with a claim that they are being withheld on the basis of "Executive Privilege" or "Privacy." For the reasons stated above no documents should be withheld on grounds of Executive Privilege. With respect to documents withheld on privacy grounds, we would expect that personal information, such as Social Security numbers, could be redacted. Please advise us of the bases under which these documents are being withheld.

Exhibit D to this letter are entries from the first and third logs which identify documents withheld on the basis of attorney-client privilege. In none of these entries is there any identification of the nature of the legal issue for which advice was sought. As discussed above, this is insufficient.

As you know, trial is scheduled for October 23 concerning the eligibility issues. We are entitled to test the State's assertion of privilege. Given the lack of specificity in the log we

¹ Certain of these entries also indicate that the document is being withheld on grounds of attorney client privilege. Yet the log does not identify whose advice is being either conveyed or provided. As stated below, such conclusory statements are insufficient. Please identify the person providing the advice and the general nature of the issue involved so that we may assess the privilege claim with respect to these entries.

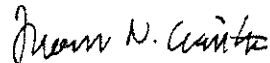
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are and have been unable to do so. We note in this regard that at his deposition earlier this week, the Governor refused to answer questions concerning topics discussed in any and all meetings where an attorney was present. To expedite resolution of the issue we request that the State submit to the Court for *in camera* inspection documents noted on the excerpts from the privilege logs in Exhibits B, C or D dated on or before July 18, 2013 as to which the State would continue to assert any privilege – whether attorney-client or otherwise, including those received or sent by the Governor.

Finally, Exhibit E contains two documents on the first and third logs which do not assert any privilege, nor do they identify a date or an author of the document. Please confirm that these documents have been produced by identifying the Bates number in the production.

Thank you for your attention to this matter and I look forward to reviewing your response.

Very truly yours,



Thomas N. Ciantra

TNC:vlf
Enclosures

EXHIBIT A

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION - DETROIT								
In re:								
CITY OF DETROIT, MICHIGAN Chapter 9								
Debtor: Case No. 13-53846								
Honorable Steven W. Rhodes								
STATE OF MICHIGAN, DEPARTMENT OF ATTORNEY GENERAL PRIVILEGE LOG								
Date	Author	Recipient	CC	Privilege	Privilege Log Comment			
3/12/2013	Baird, Richard (GOV) <O=MIGOV/O U=EXCHANGE ADMINISTRAT IVE GROUP (FYDIBOHF23S PDLT)/CN=RE CIPIENTS/CN= BAIRD>	'Keyyn Orr' <korr@JonesDay.com>		Attorney by Client; Produce- Redact	Email forwarding attorney's legal advice; privileged Email are redacted			

EXHIBIT B

1/6/2013	Richard Mulcairn <rmulcain@icloud.com>	Baird, Richard (GOV) <rbaire@michigan.gov>	Richard D. Mulcairn Esq., Mr. <rdmulcain@comcast.net>	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>	Muchmore, Dennis (GOV) <muchmore@michigan.gov>; Snyder, Rick (GOV) <snyderri1@michigan.gov>	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>; Richard Mulcairn <rmulcain@icloud.com>; Snyder, Rick (GOV) <snyderri1@michigan.gov>	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Baird, Richard (GOV) <R-MIGOV/OU-EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BARDOR>	Dillon, Andy (Treasury) <dillonA2@michigan.gov>; Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Richard Mulcairn <rmulcain@icloud.com>; Snyder, Rick (GOV) <snyderri1@michigan.gov>	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Baird, Richard (GOV) <R-MIGOV/OU-EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BARDOR>	Scott, Allison (GOV) <scotta12@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Gabola, Michael (GOV) <sgabola@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>; Richard Mulcairn <rmulcain@icloud.com>; Snyder, Rick (GOV) <snyderri1@michigan.gov>	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Baird, Richard (GOV) <rbaire@michigan.gov>	Muchmore, Dennis (GOV) <muchmore@michigan.gov>; Richard Mulcairn <rmulcain@icloud.com>; Snyder, Rick (GOV) <snyderri1@michigan.gov>	Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate.
1/6/2013	Baird, Richard (GOV) <R-MIGOV/OU-EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BARDOR>	[Name] <[Address]@bigjoball.net>	Dillon, Andy (Treasury) <dillonA2@michigan.gov>; Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted.
1/6/2013	Baird, Richard (GOV) <R-MIGOV/OU-EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BARDOR>	Scott, Allison (GOV) <scotta12@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted.
1/6/2013	[Name] <[Address]@bigjoball.net>	Baird, Richard (GOV) <rbaire@michigan.gov>		Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted.
1/6/2013	Baird, Richard (GOV) <R-MIGOV/OU-EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BARDOR>	Muchmore, Dennis (GOV) <muchmore@michigan.gov>		Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted.

1/6/2013	Dillon, Andy (Treasury) <dillon2@michigan.gov>	Scott, Allison (GOV) <scott12@michigan.gov>	Baird, Richard (Treasury) <baird@michigan.gov>; Hickey, Amy (Treasury) <ahickey@michigan.gov>; Snyder, Rick (GOV) <snyder1@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/6/2013	Shaw, Andy (Treasury) <shaw@michigan.gov>	Snyder, Amy (Treasury) <ahickey@michigan.gov>; Baird, Richard (GOV) <baird@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/7/2013	Gaskin, Michael (GOV) <Gaskin@michigan.gov>	Baird, Richard (GOV) <baird@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/7/2013	Baird, Richard (GOV) <baird@michigan.gov>	Gaskin, Michael (GOV) <Gaskin@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/7/2013	Baird, Richard (GOV) <baird@michigan.gov>	Gaskin, Michael (GOV) <Gaskin@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/7/2013	Gaskin, Michael (GOV) <Gaskin@michigan.gov>	McIntyre, Dennis (GOV) <mcintyre@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/7/2013	Gaskin, Michael (GOV) <Gaskin@michigan.gov>	McIntyre, Dennis (GOV) <mcintyre@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/7/2013	Gaskin, Michael (GOV) <Gaskin@michigan.gov>	Baird, Richard (GOV) <baird@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/7/2013	Gaskin, Michael (GOV) <Gaskin@michigan.gov>	McIntyre, Dennis (GOV) <mcintyre@michigan.gov>	Attorney Client; Executive Privilege	Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/8/2013	Hudson, Frederick (Treasury) <Hudson@treasury.gov>	Dillon, Andy (Treasury) <dillon2@michigan.gov>	Attorney Client; Work Product; Executive Privilege	Attorney Client; Work Product; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/8/2013	McIntyre, Dennis (GOV) <mcintyre@michigan.gov>	McIntyre, Dennis (GOV) <mcintyre@michigan.gov>; Baird, Richard (GOV) <baird@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/8/2013	Vandewalle, Michele (GOV) <vandewalle@michigan.gov>	Baird, Richard (GOV) <baird@michigan.gov>	Executive Privilege	Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted
1/9/2013	Wagner, Scott (GOV) <Wagner@michigan.gov>	Baird, Richard (GOV) <baird@michigan.gov>	Executive Privilege	Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted
1/9/2013	Baird, Richard (GOV) <baird@michigan.gov>	Scott, Allison (GOV) <scott12@michigan.gov>	Executive Privilege	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/9/2013	Scott, Allison (GOV) <scott12@michigan.gov>	Snyder, Rick (GOV) <snyder1@michigan.gov>	Executive Privilege	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/10/2013	Scott, Allison (GOV) <scott12@michigan.gov>	Wagner, Scott (GOV) <Wagner@michigan.gov>	Executive Privilege	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/10/2013	Scott, Allison (GOV) <scott12@michigan.gov>	Wagner, Scott (GOV) <Wagner@michigan.gov>	Executive Privilege	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/10/2013	Vandewalle, Michele (GOV) <vandewalle@michigan.gov>	Baird, Richard (GOV) <baird@michigan.gov>	Executive Privilege	Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted
1/10/2013	Vandewalle, Michele (GOV) <vandewalle@michigan.gov>	Baird, Richard (GOV) <baird@michigan.gov>	Executive Privilege	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/14/2013	Baird, Richard (GOV) <baird@michigan.gov>	Snyder, Rick (GOV) <snyder1@michigan.gov>; Scott, Allison (GOV) <scott12@michigan.gov>; McIntyre, Dennis (GOV) <mcintyre@michigan.gov>; Roberts, John (GOV) <roberts@michigan.gov>	Executive Privilege	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
1/15/2013	Baird, Richard (GOV) <baird@michigan.gov>	Snyder, Rick (GOV) <snyder1@michigan.gov>; McIntyre, Dennis (GOV) <mcintyre@michigan.gov>; Dillon, Andy (Treasury) <dillon2@michigan.gov>; Stibitz, Brom (Treasury) <stibitz@michigan.gov>; Roberts, John (GOV) <roberts@michigan.gov>	Executive Privilege	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted

1/15/2013	[Name] <(Address)@gmail.com>	Scott, Allison (GOV) <scottal12@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>	Executive Privilege	Email attaching resume of emergency manager candidate	
1/16/2013	Scott, Allison (GOV) <scottal12@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
1/17/2013	Scott, Allison (GOV) <scottal12@michigan.gov>	Dillon, Andy (Treasury) <dillonA2@michigan.gov>; Sibalz, Brian (Treasury) <sbibalz@michigan.gov>; Muchmore, Dennis (GOV) <muchmore@michigan.gov>; Roberts, John (GOV) <robertsj@michigan.gov>	Executive Privilege	Emergency manager candidate information	
1/20/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	VasSidel, Michele (GOV) <vasidelm@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted and resume is withheld	
1/20/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Snyder, Rick (GOV) <snyderri1@michigan.gov>; Muchmore, Dennis (GOV) <muchmore@michigan.gov>; Roberts, John (GOV) <robertsj@michigan.gov>; Scott, Allison (GOV) <scottal12@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/4/2013	Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/4/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/5/2013	Muchmore, Dennis (GOV) <muchmore@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/6/2013	Holles, Henry (GOV) <hollesh@michigan.gov>	John E. Johnson, Jr. <johnjohnson.spe@ed.com>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/20/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Snyder, Rick (GOV) <snyderri1@michigan.gov>; Muchmore, Dennis (GOV) <muchmore@michigan.gov>; Roberts, John (GOV) <robertsj@michigan.gov>; Scott, Allison (GOV) <scottal12@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/27/2013	Dillon, Andy (Treasury) <dillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Sibalz, Brian (Treasury) <sbibalz@michigan.gov>; Saxton, Thomas (Treasury) <saxtonT@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/27/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	VasSidel, Michele (GOV) <vasidelm@michigan.gov>	Executive Privilege	Email discussing emergency-manager candidate and attaching resume of same	
2/27/2013	Scott, Allison (GOV) <scottal12@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Executive Privilege	Email discussing emergency-manager candidate and attaching resume of same	
2/27/2013	[Name] <(Address)@gmail.com>	Baird, Richard (GOV) <bairdr@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/27/2013	VasSidel, Michele (GOV) <vasidelm2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Executive Privilege	Email attaching resume of emergency manager candidate	
2/27/2013	Baird, Richard (GOV) <(Address)@gmail.com>	[Name] <(Address)@gmail.com>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
2/27/2013	[Name] <(Address)@gmail.com>	Baird, Richard (GOV) <bairdr@michigan.gov>	Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	

2/22/2013	(Name) <(Address)>	VanSledre, Michele (GOV) <vansledre@michigan.gov>		Executive Privilege	Email attaching resume of emergency manager candidate
2/22/2013	(Name) <(Address)>	VanSledre, Michele (GOV) <vansledre@michigan.gov>		Executive Privilege	Email attaching resume of emergency manager candidate
2/22/2013	(Name) <(Address)>	VanSledre, Michele (GOV) <vansledre@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
2/28/2013	(Name) <(Address)>	Baird, Richard (GOV) <rbaird@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
3/17/2013	(Name) <(Address)>	Dillon, Andy (Treasury) <Adillon2@michigan.gov>		Executive Privilege	Email with emergency manager candidate
3/27/2013	(Name) <(Address)>	Shibez, Brian (Treasury) <BShibez@michigan.gov>		Executive Privilege	
3/27/2013	(Name) <(Address)>	Snyder, Rick (GOV) <rsnyder1@michigan.gov>		Executive Privilege	Email regarding emergency manager candidate; candidate's resume withheld
3/27/2013	(Name) <(Address)>	Baird, Richard (GOV) <rbaird@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
3/28/2013	(Name) <(Address)>	Baird, Richard (GOV) <rbaird@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
3/28/2013	(Name) <(Address)>	Gooley, Michael (Treasury) <MGooley@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
3/28/2013	(Name) <(Address)>	Shibez, Brian (Treasury) <BShibez@michigan.gov>		Executive Privilege	Email related to communications setting and providing legal advice and attaching attorney draft with comments
3/28/2013	(Name) <(Address)>	Shibez, Brian (Treasury) <BShibez@michigan.gov>		Executive Privilege	Email requesting legal advice of counsel
3/28/2013	(Name) <(Address)>	Shibez, Brian (Treasury) <BShibez@michigan.gov>		Executive Privilege	Email attaching resume of emergency manager candidate
3/28/2013	(Name) <(Address)>	Wurfel, Sam (GOV) <Wurfel@michigan.gov>		Executive Privilege	Email attaching resume of emergency manager candidate
3/28/2013	(Name) <(Address)>	Shibez, Brian (Treasury) <BShibez@michigan.gov>		Executive Privilege	Email forwarding attorney's legal advice & identifying candidates for emergency manager
4/1/2013	(Name) <(Address)>	VanSledre, Michele (GOV) <vansledre@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
4/5/2013	(Name) <(Address)>	Snyder, Rick (GOV) <rsnyder1@michigan.gov>		Executive Privilege	Email forwarding document containing privileged and work product information regarding anticipated litigation; remaining attachment contains Governor's briefing and is entirely nonresponsive
7/18/2013	(Name) <(Address)>	Snyder, Rick (GOV) <rsnyder1@michigan.gov>		Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted

EXHIBIT C

DOC ID	Privilege	PrivilegeReason
SOM0001077	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001078	Yes - Entire Document	Attorney Client Communication
SOM0001079	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001080	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001081	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001082	Yes - Entire Document	Attorney Client Communication
SOM0001083	Yes - Entire Document	Attorney Client Communication
SOM0001084	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001085	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001086	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001087	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001088	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001089	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001090	Yes - Entire Document	Attorney Client Communication
SOM0001091	Yes - Entire Document	Attorney Client Communication
SOM0001092	Yes - Entire Document	Attorney Client Communication
SOM0001093	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001094	Yes - Entire Document	Attorney Client Communication
SOM0001095	Yes - Entire Document	Attorney Client Communication;Executive Privilege
SOM0001096	Yes - Entire Document	Executive Privilege
SOM0001097	Yes - Entire Document	Executive Privilege
SOM0001098	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001099	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001100	Yes - Entire Document	Attorney Client Communication
SOM0001101	Yes - Entire Document	Attorney Client Communication
SOM0001102	Yes - Entire Document	Attorney Client Communication
SOM0001103	Yes - Entire Document	Attorney Work Product
SOM0001104	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001105	Yes - Entire Document	Attorney Work Product
SOM0001106	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001107	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001108	Yes - Entire Document	Attorney Client Communication;Attorney Work Product
SOM0001109	Yes - Entire Document	Attorney Client Communication;Attorney Work Product

DOC ID	Privilege	Privilege Reason
SOM0001110	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001111	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001112	Yes - Entire Document	Attorney Work Product
SOM0001113	Yes - Entire Document	Attorney Work Product
SOM0001114	Yes - Entire Document	Attorney Work Product
SOM0001115	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001116	Yes - Entire Document	Attorney Work Product
SOM0001117	Yes - Entire Document	Attorney Work Product
SOM0001118	Yes - Entire Document	Attorney Work Product
SOM0001119	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001120	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001121	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001122	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001123	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001124	Yes - Entire Document	Attorney Work Product
SOM0001125	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001126	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001127	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001128	Yes - Entire Document	Attorney Work Product
SOM0001129	Yes - Entire Document	Attorney Work Product
SOM0001130	Yes - Entire Document	Attorney Work Product
SOM0001131	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001132	Yes - Entire Document	Attorney Client Communication; Attorney Work Product
SOM0001133	Yes - Entire Document	Attorney Client Communication; Executive Privilege
SOM0001134	Yes - Entire Document	Attorney Work Product; Executive Privilege
SOM0001135	Yes - Printed & Redacted	Executive Privilege
SOM0001142	Yes - Printed & Redacted	Privacy
SOM0001143	Yes - Printed & Redacted	Privacy
SOM0001147	Yes - Printed & Redacted	Privacy
SOM0001149	Yes - Printed & Redacted	Executive Privilege

EXHIBIT D

3/13/2013	Scarl, Michael (GOV) <MSCARL@MICHIGAN.GOV> ADMINISTRATIVE GROUP (FY2010HF3SPOLTY)CH=RECIPIENTS/CH=GAOLIAN>	Adams, John (GOV) <adamsj@michigan.gov>	Ward, Lisa (GOV) <wardlisa@michigan.gov>	Attorney Client	Small related to communications seeking and providing legal advice and attaching attorney draft with comments	+
3/13/2013	Scarl, John (GOV) <JSCARL@MICHIGAN.GOV> ADMINISTRATIVE GROUP (FY2010HF3SPOLTY)CH=RECIPIENTS/CH=ROBERTS>	Wheeler, Wendy (GOV) <wheelerw@michigan.gov>	Attorney Client	Attorney Client	Small related to communications seeking and providing legal advice and attaching attorney draft with comments	+
3/13/2013	Readers, Tom (GOV) <tomr@mid@michigan.gov>	Snyder, Rick (GOV) <snyder11@michigan.gov>	Produce Request	Produce Request	Unrelated and unresponsive Governor's briefing information requested	+
3/14/2013	Ward, Lisa (GOV) <WARDLISA@MICHIGAN.GOV> ADMINISTRATIVE GROUP (FY2010HF3SPOLTY)CH=RECIPIENTS/CH=GAOLIAN>	Readers, Tom (GOV) <tomr@mid@michigan.gov>	Attorney Client	Attorney Client	Small and attachment containing communications related to provision of legal advice by counsel	+
3/20/2013	Readers, Tom (GOV) <tomr@mid@michigan.gov>	Snyder, Rick (GOV) <snyder11@michigan.gov>	Produce Request	Attorney Client; Produce Request	Small and attachment containing communications related to provision of legal advice by counsel	+
3/21/2013	Horvath, Tim (AG) <THORVATH@MICHIGAN.GOV> Horvath, Mark (AG) <MARKHORVATH@MICHIGAN.GOV>	Good, Michael (GOV) <GOODMICHAEL@MICHIGAN.GOV>	Attorney Client; Work Product	Attorney Client; Work Product	Small between counsel stating legal advice and mental impressions regarding litigation	+
3/26/2013	Scarl, John (GOV) <JSCARL@MICHIGAN.GOV> ADMINISTRATIVE GROUP (FY2010HF3SPOLTY)CH=RECIPIENTS/CH=GAOLIAN>	Good, Michael (GOV) <GOODMICHAEL@MICHIGAN.GOV>	Attorney Client; Work Product	Attorney Client; Work Product	Small containing and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
3/26/2013	Scarl, John (GOV) <JSCARL@MICHIGAN.GOV> ADMINISTRATIVE GROUP (FY2010HF3SPOLTY)CH=RECIPIENTS/CH=GAOLIAN>	Wilk, W. Ann <WANN@BYEMES.COM>	Attorney Client	Attorney Client	Small containing and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
3/26/2013	Wilk, W. Ann <WANN@BYEMES.COM>	Good, Michael (GOV) <GOODMICHAEL@MICHIGAN.GOV>	Attorney Client	Attorney Client	Small containing legal advice and sets to draft document	Nerd fund ?
3/26/2013	Good, Michael (GOV) <GOODMICHAEL@MICHIGAN.GOV>	Good, Michael (GOV) <GOODMICHAEL@MICHIGAN.GOV>	Attorney Client	Attorney Client	Small containing legal advice and sets to draft document	+
3/26/2013	Good, Michael (GOV) <GOODMICHAEL@MICHIGAN.GOV>	Scarl, Allison (GOV) <SCARL@MICHIGAN.GOV>	Attorney Client	Attorney Client	Small containing legal advice and sets to draft document	* Wilk is linked to NERD Fund
3/26/2013	Good, Michael (GOV) <GOODMICHAEL@MICHIGAN.GOV>	Scarl, Allison (GOV) <SCARL@MICHIGAN.GOV>	Attorney Client	Attorney Client	Small containing legal advice and sets to draft document	+

5/10/2013	Feider, Greg (GOV) <gfeider@midMichigan.gov>	Hayfield, Jeff (GOV) <jhayfield@midMichigan.gov>; Wurfel, Sara (GOV) <swurfel@midMichigan.gov>; Brownfield, Michael (GOV) <mbrownfield@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/10/2013	Roberts, John (GOV) <jroberts@midMichigan.gov>	Wurfel, Sara (GOV) <swurfel@midMichigan.gov>; Hayfield, Jeff (GOV) <jhayfield@midMichigan.gov>; Brownfield, Michael (GOV) <mbrownfield@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/10/2013	Feider, Greg (GOV) <gfeider@midMichigan.gov>	Scott, Alison (GOV) <ascott12@midMichigan.gov>	Attorney Client; Work Product	Email conveying and relating to legal advice from counsel	+
5/10/2013	Booth, Allison (GOV) <aboott12@midMichigan.gov>	Snyder, Rick (GOV) <rsnyder11@midMichigan.gov>	Attorney Client; Work Product	Email conveying and relating to legal advice from counsel and attaching draft documents prepared to jurisdiction	+
5/12/2013	Bill Newing <newing@midMichigan.gov>	Wurfel, Sara (GOV) <swurfel@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/12/2013	Bill Newing <newing@midMichigan.gov>	Wurfel, Sara (GOV) <swurfel@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/12/2013	Samson, Terry A. (Treasury) <tsamson@midMichigan.gov>	Wurfel, Sara (GOV) <swurfel@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/12/2013	Samson, Terry A. (Treasury) <tsamson@midMichigan.gov>	Sutton, Thomas (Treasury) <tsutton@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/12/2013	Samson, Thomas (Treasury) <tsamson@midMichigan.gov>	Sutton, Terry A. (Treasury) <tsutton@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/12/2013	Wurfel, Sara (GOV) <swurfel@midMichigan.gov>	Bill Newing <newing@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/13/2013	Feider, Greg (GOV) <gfeider@midMichigan.gov>	McPherson, Dennis (GOV) <dmcpherson@midMichigan.gov>; Roberts, John (GOV) <jroberts@midMichigan.gov>; Brownfield, Michael (GOV) <mbrownfield@midMichigan.gov>; Wurfel, Sara (GOV) <swurfel@midMichigan.gov>; Geddes, Michael (GOV) <mgeddes@midMichigan.gov>; Haskins, Jeff (GOV) <jhaskins@midMichigan.gov>; Leonard, Janel (GOV) <jleonard@midMichigan.gov>; Rusten, William (GOV) <wrusten@midMichigan.gov>; Hesthuis, Dore (GOV) <dhesthuis@midMichigan.gov>; Sand, Richard (GOV) <rsand@midMichigan.gov>; Hollis, Harvey (GOV) <hhollis@midMichigan.gov>; Tomic, Eric (GOV) <etomic@midMichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
5/14/2013	www@sniewski.com	W. Ann Wile <aww@sniewski.com>	Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	Nerd fund ?
5/17/2013	Tommy A. (Treasury) <tsamson@midMichigan.gov>	Samson, Terry A. (Treasury) <tsamson@midMichigan.gov>; Korynt, Edward (Treasury) <ekorynt@midMichigan.gov>	Attorney Client; Work Product	Email forwarding counsel's legal advice and mutual impressions regarding litigation	+
5/20/2013	Gaurav Mahotra@ey.com	Edley, Andy (Treasury) <aedley@midMichigan.gov>; Sutton, Thomas (Treasury) <tsutton@midMichigan.gov>; Sand, Brian (Treasury) <bsand@midMichigan.gov>	Attorney Client	Email conveying legal advice and relating to legal advice from counsel and forwarding report from Eric and Tony prepared at direction of counsel, withheld based upon common interest doctrine	+
5/20/2013	Wurfel, Sara (GOV) <swurfel@midMichigan.gov>	Scott, Alison (GOV) <ascott12@midMichigan.gov>; Geddes, Michael (GOV) <mgeddes@midMichigan.gov>	Attorney Client; Work Product	Email conveying legal advice	+

6/19/2013	Muchmore, Dennis (GOV) <muchmore@nichigan.gov>	Stibitz, Brent (Treasury) <stibitz@nichigan.gov>; Roberts, John (GOV) <roberts@nichigan.gov>; Gadsden, Michael (GOV) <gadsden@nichigan.gov>	Stanton, Thomas (Treasury) <stanton@nichigan.gov>; Olson, Andy (Treasury) <olson@nichigan.gov>	Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
6/20/2013	Brown, Helaine (LAW) <brownH4@nichigan.gov>	Stanton, Terry A. (Treasury) <stanton@nichigan.gov>; Bryn, Michele (AG) <bryn@nichigan.gov>	Wardle, Sam (GOV) <wardle@nichigan.gov>; Lums, Lauren (GOV) <lums@nichigan.gov>; Smith, Jennifer (GOV) <smith@nichigan.gov>; Sells, Brent (Treasury) <sells@nichigan.gov>; Brown, Helaine (LAW) <brownH4@nichigan.gov>; Jackson, Jennifer (AG) <jackson@nichigan.gov>	Attorney Client	Email requesting advice of counsel	+
6/20/2013	Lums, Lauren (DTHB) <lums@nichigan.gov>	Stanton, Terry A. (Treasury) <stanton@nichigan.gov>; Bryn, Michele (AG) <bryn@nichigan.gov>	Wardle, Sam (GOV) <wardle@nichigan.gov>; Lums, Lauren (GOV) <lums@nichigan.gov>; Smith, Jennifer (GOV) <smith@nichigan.gov>; Sells, Brent (Treasury) <sells@nichigan.gov>; Brown, Helaine (LAW) <brownH4@nichigan.gov>; Jackson, Jennifer (AG) <jackson@nichigan.gov>	Attorney Client	Email requesting advice of counsel	+
6/20/2013	Stanton, Terry A. (Treasury) <stanton@nichigan.gov>	Bryn, Michele (AG) <bryn@nichigan.gov>	Wardle, Sam (GOV) <wardle@nichigan.gov>; Lums, Lauren (GOV) <lums@nichigan.gov>; Smith, Jennifer (GOV) <smith@nichigan.gov>; Sells, Brent (Treasury) <sells@nichigan.gov>; Brown, Helaine (LAW) <brownH4@nichigan.gov>; Jackson, Jennifer (AG) <jackson@nichigan.gov>	Attorney Client	Email requesting advice of counsel	+
6/20/2013	Bryn, Michele (AG) <bryn@nichigan.gov>	Stanton, Terry A. (Treasury) <stanton@nichigan.gov>; Wardle, Sam (GOV) <wardle@nichigan.gov>	Wardle, Sam (GOV) <wardle@nichigan.gov>; Lums, Lauren (GOV) <lums@nichigan.gov>; Smith, Jennifer (GOV) <smith@nichigan.gov>; Sells, Brent (Treasury) <sells@nichigan.gov>; Brown, Helaine (LAW) <brownH4@nichigan.gov>; Jackson, Jennifer (AG) <jackson@nichigan.gov>	Attorney Client	Email seeking attorney advice	+
6/20/2013	Stanton, Terry A. (Treasury) <stanton@nichigan.gov>	Bryn, Michele (AG) <bryn@nichigan.gov>; Wardle, Sam (GOV) <wardle@nichigan.gov>	Wardle, Sam (GOV) <wardle@nichigan.gov>; Lums, Lauren (GOV) <lums@nichigan.gov>; Smith, Jennifer (GOV) <smith@nichigan.gov>; Sells, Brent (Treasury) <sells@nichigan.gov>; Brown, Helaine (LAW) <brownH4@nichigan.gov>; Jackson, Jennifer (AG) <jackson@nichigan.gov>	Attorney Client	Email conveying and relating to legal advice from counsel	+
6/20/2013	Stibitz, Brent (Treasury) <stibitz@nichigan.gov>	Stanton, Terry A. (Treasury) <stanton@nichigan.gov>; Bryn, Michele (AG) <bryn@nichigan.gov>; Wardle, Sam (GOV) <wardle@nichigan.gov>	Brown, Helaine (LAW) <brownH4@nichigan.gov>	Attorney Client	Email requesting advice of counsel	+
6/21/2013	Gadsden, Michael (GOV) <gadsden@nichigan.gov>	Muchmore, Dennis (GOV) <muchmore@nichigan.gov>; Stibitz, Brent (Treasury) <stibitz@nichigan.gov>; Roberts, John (GOV) <roberts@nichigan.gov>	Stanton, Thomas (Treasury) <stanton@nichigan.gov>; Olson, Andy (Treasury) <olson@nichigan.gov>	Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
6/21/2013	Muchmore, Dennis (GOV) <muchmore@nichigan.gov>	Gadsden, Michael (GOV) <gadsden@nichigan.gov>	Stanton, Thomas (Treasury) <stanton@nichigan.gov>; Olson, Andy (Treasury) <olson@nichigan.gov>	Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
6/22/2013	Gadsden, Michael (GOV) <gadsden@nichigan.gov>	Muchmore, Dennis (GOV) <muchmore@nichigan.gov>	Stanton, Thomas (Treasury) <stanton@nichigan.gov>; Olson, Andy (Treasury) <olson@nichigan.gov>	Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
6/24/2013	Snyder, Rick (GOV) <snyder1@nichigan.gov>	Olson, Andy (Treasury) <olson@nichigan.gov>	Stanton, Thomas (Treasury) <stanton@nichigan.gov>	Attorney Client; Product Redact	Reference to legal opinion from Jones Day is redacted	+

6/6/2013	Schultz, Brent (Treasury) <bschultz@treasury.gov>	Quarles, Sam (Treasury) <QuarlesS@treasury.gov>		Attorney Client	Small providing legal advice and attaching attorney draft documents in connection with provision of legal advice	+
6/6/2013	Sutton, Brent (Treasury) <bsutton@treasury.gov>	Sutton, Terry A. (Treasury) <tsutton@treasury.gov>		Attorney Client	Small conveying and relating to legal advice from Jones Day	+
7/2/2013	Sutton, Thomas (Treasury) <tsutton@treasury.gov>	Allen, Josh (Treasury) <jallen@treasury.gov>		Attorney Client	Small conveying and relating to legal advice from counsel	+
7/2/2013	Schneider, Matthew (NO) <mschneider@no.gov>	Gasko, Michael (DOJ) <mgasko@doj.gov>		Attorney Client; Work Product	Small seeking legal advice regarding anticipated litigation	+
7/2/2013	Muchmore, David P. <dpmuchmore@treasury.gov>	Sutton, Thomas (Treasury) <tsutton@treasury.gov>; Workman, Mark <workman@treasury.gov>		Attorney Client; Work Product	Small conveying and relating to legal advice from counsel and discussing draft document	+
7/3/2013	Tedder, Greg (DOJ) <gttedder@doj.gov>	Dirr, Kevin (Treasury) <dirrk@treasury.gov>		Attorney Client; Work Product	Small containing attorney drafts	+
7/5/2013	Hughes, David (DOJ) <davidhughes@doj.gov>	Schultz, Brent (DOJ) <bschultz@doj.gov>; Sullivan, John (DOJ) <jsullivan@doj.gov>; Workman, Mark (DOJ) <workman@doj.gov>; Tedder, Greg (DOJ) <gttedder@doj.gov>; Postema, Jack (DOJ) <jpostema@doj.gov>; Sullivan, John (DOJ) <jsullivan@doj.gov>; Tedder, Greg (DOJ) <gttedder@doj.gov>; Workman, Mark (DOJ) <workman@doj.gov>; Dirr, Kevin (Treasury) <dirrk@treasury.gov>; Tedder, Greg (DOJ) <gttedder@doj.gov>; Gasko, Michael (DOJ) <mgasko@doj.gov>; Tedder, Greg (DOJ) <gttedder@doj.gov>; Dirr, Kevin (Treasury) <dirrk@treasury.gov>; Tedder, Greg (DOJ) <gttedder@doj.gov>		Attorney Client; Work Product	Small from counsel seeking legal advice and mental impressions regarding litigation	+
7/5/2013	Bill Nussling <bnussling@treasury.gov>	Wurfl, Sam (DOJ) <swurfl@doj.gov>; Horvath, Jeff (DOJ) <jhorvath@doj.gov>; Roberts, John (DOJ) <jroberts@doj.gov>; Tedder, Greg (DOJ) <gttedder@doj.gov>; Station, Terry A. (Treasury) <tsutton@treasury.gov>		Work Product	Small prepared in anticipation of litigation	+
7/6/2013	Allen, Andy (Treasury) <allen@treasury.gov>	Schultz, Brent (Treasury) <bschultz@treasury.gov>		Attorney Client	Small conveying and relating to legal advice from Jones Day	+
7/7/2013	Allen, Andy (Treasury) <allen@treasury.gov>	Allen, Andy (Treasury) <allen@treasury.gov>; Tedder, Greg (DOJ) <gttedder@doj.gov>		Attorney Client	Small related to communications seeking legal advice and providing direction to Tedder, Horvath in preparation of draft documents related to provision of legal advice	+
7/7/2013	Kevin Dirr <dirrk@treasury.gov>	Dirr, Andy (Treasury) <adirr@treasury.gov>; Station, Thomas (Treasury) <tsutton@treasury.gov>; Schatz, Brent (Treasury) <bschultz@treasury.gov>		Work Product	Small conveying and relating to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
7/12/2013	Muchmore, Dennis (DOJ) <dmuchmore@doj.gov>	Snyder, Rick (DOJ) <rsnyder11@doj.gov>		Attorney Client	Small conveying and relating to legal advice from counsel	+
7/12/2013	Tedder, Greg (DOJ) <gttedder@doj.gov>	Muchmore, Dennis (DOJ) <dmuchmore@doj.gov>		Attorney Client	Small related to communications seeking legal advice and discussing strategy in anticipation of litigation	+
7/12/2013	Muchmore, Dennis (DOJ) <dmuchmore@doj.gov>	Allen, Andy (Treasury) <allen@treasury.gov>		Attorney Client	Small conveying and relating to legal advice from counsel	+
7/12/2013	Muchmore, Dennis (DOJ) <dmuchmore@doj.gov>	Tedder, Greg (DOJ) <gttedder@doj.gov>		Attorney Client	Small related to communications seeking legal advice and discussing strategy in anticipation of litigation	+
7/12/2013	Allen, Richard (DOJ) <allen@doj.gov>	Muchmore, Dennis (DOJ) <dmuchmore@doj.gov>		Attorney Client	Small related to communications seeking legal advice and discussing strategy in anticipation of litigation	+
7/12/2013	Gasko, Michael (DOJ) <mgasko@doj.gov>	Snyder, Rick (DOJ) <rsnyder11@doj.gov>		Attorney Client; Work Product	Small providing legal advice and containing communications regarding materials prepared in anticipation of litigation	+
7/12/2013	Muchmore, Dennis (DOJ) <dmuchmore@doj.gov>	Allen, Richard (DOJ) <allen@doj.gov>		Attorney Client; Work Product	Small related to communications seeking legal advice and discussing strategy in anticipation of litigation	+

7/17/2013	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Snyder, Rick (GOV) <rsnyder11@midmichigan.gov>	Scott, Allison (GOV) <scottal12@midmichigan.gov>; Brader, Valerie (GOV) <brader@midmichigan.gov>; <SnyderR11@midmichigan.gov>	Attorney Client; Work Product	Small conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
7/17/2013	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Snyder, Rick (GOV) <rsnyder11@midmichigan.gov>	Scott, Allison (GOV) <scottal12@midmichigan.gov>; Brader, Valerie (GOV) <brader@midmichigan.gov>	Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	+
7/17/2013	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Brader, Valerie (GOV) <brader@midmichigan.gov>		Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	+
7/18/2013	Snyder, Rick (GOV) <rsnyder11@midmichigan.gov>	Hayfield, Jeff (GOV) <jhayfield@midmichigan.gov>; Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>	Scott, Allison (GOV) <scottal12@midmichigan.gov>; Brader, Valerie (GOV) <brader@midmichigan.gov>; <rsnyder11@midmichigan.gov>	Attorney Client	Email conveying and related to legal advice from counsel	+
7/18/2013	Scott, Allison (GOV) <scottal12@midmichigan.gov>	Hayfield, Jeff (GOV) <jhayfield@midmichigan.gov>; Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>		Attorney Client	Email conveying and related to legal advice from counsel	+
7/18/2013	Scott, Allison (GOV) <scottal12@midmichigan.gov>	Hayfield, Jeff (GOV) <jhayfield@midmichigan.gov>; Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>	Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>	Attorney Client	Email conveying and related to legal advice from counsel	+
7/18/2013	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Hayfield, Jeff (GOV) <jhayfield@midmichigan.gov>; Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>	Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>	Attorney Client	Email providing legal advice	+
7/18/2013	Hayfield, Jeff (GOV) <jhayfield@midmichigan.gov>	Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>; Tedder, Greg (GOV) <tredder@midmichigan.gov>; Snyder, Rick (GOV) <rsnyder11@midmichigan.gov>; Scott, Allison (GOV) <scottal12@midmichigan.gov>; Mulmore, Dennis (GOV) <mulmore@midmichigan.gov>; Roberts, John (GOV) <roberts@midmichigan.gov>; Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>; Brader, Valerie (GOV) <brader@midmichigan.gov>		Attorney Client	Email conveying and related to legal advice from counsel	+
7/18/2013	Wurfl, Sara (GOV) <wurflsara@midmichigan.gov>	Tedder, Greg (GOV) <tredder@midmichigan.gov>; Snyder, Rick (GOV) <rsnyder11@midmichigan.gov>; Scott, Allison (GOV) <scottal12@midmichigan.gov>; Mulmore, Dennis (GOV) <mulmore@midmichigan.gov>; Roberts, John (GOV) <roberts@midmichigan.gov>; Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>; Brader, Valerie (GOV) <brader@midmichigan.gov>		Attorney Client	Email relaying attorney advice	+
7/18/2013	Brader, Valerie (GOV) <brader@midmichigan.gov>	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Attorney Client	Communication regarding legal advice and litigation	+
7/18/2013	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Brader, Valerie (GOV) <brader@midmichigan.gov>	Brader, Valerie (GOV) <brader@midmichigan.gov>	Attorney Client	Communication regarding legal advice and litigation	+
7/18/2013	Brader, Valerie (GOV) <brader@midmichigan.gov>	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Attorney Client	Email conveying attorney directions and asks to start document	+
7/18/2013	Brader, Valerie (GOV) <brader@midmichigan.gov>	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Gaskin, Michael (GOV) <GaskinM@midmichigan.gov>	Attorney Client	Email relaying legal advice from counsel	+

7/18/2013	Gabriel, Michael (GOV) <GabrielM@mtc.state.gov>	Snyder, Bob (GOV) <rsnyder11@mtc.state.gov>; Muchmore, Scott, Allison (GOV) <scottall2@mtc.state.gov>; Dennis (GOV) <rmuchmore@mtc.state.gov>; Roberts, John (GOV) <robertsj@mtc.state.gov>; Ward, Sara (GOV) <ward_sara@mtc.state.gov>; Bricker, Vicki (GOV) <bricker_v@mtc.state.gov>; Tisdler, Greg (GOV) <gregt@mtc.state.gov>		Attorney-Client; Work Product	Local providing legal advice	+	
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		<WardSara@mtc.state.gov>; Sara, Sara (GOV) <SaraSara@mtc.state.gov>				+	

EXHIBIT E

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION - DETROIT						
In re:						
CITY OF DETROIT, MICHIGAN Chapter 9						
Debtor, Case No. 13-53846						
Honorable Steven W. Rhodes						
STATE OF MICHIGAN, DEPARTMENT OF ATTORNEY GENERAL PRIVILEGE LOG						
Date	Author	Recipient	CC	Privilege	Privilege Log Comment	
		emcor@comcast.net; Gaurav Maheshwari; Tomlin, Greg (GTM) <gtd@comcast.net>; Dillen, Andy (TAMM) <andy.dillen@tamm.net>	Marshall, Stephen <stephen.marshall@uscourts.gov>; Harris, Kyle <kyle.harris@uscourts.gov>; Pelt, Vincent <vincent.pelt@uscourts.gov>			
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